District Judge James L. Robart 1 2 3 4 5 6 UNITED STATES DISTRICT COURT FOR THE 7 WESTERN DISTRICT OF WASHINGTON AT SEATTLE 8 9 JULIO CURY and TAKAO YAMADA, Case No. 2:23-cv-00499-JLR 10 Plaintiffs, FOURTH SUPPLEMENTAL JOINT STATUS REPORT 11 v. DEPARTMENT OF STATE, and 12 DEPARTMENT OF HOMELAND SECURITY, 13 14 Defendants. 15 16 JOINT STATUS REPORT 17 The parties submit this Joint Status Report to update the Court on its ongoing meet and 18 confer efforts. Since the parties previous Joint Status Report (Dkt. 14), State has worked on 19 addressing questions and issues raised by Plaintiffs and the parties have narrowed the issues regarding CBP's redactions. Additional documents are under review for potential release to 20 21 Plaintiffs. 22 The parties believe they can continue to narrow several issues, thereby minimizing the 23 need for Court and party resources in any substantive briefing. In order to allow the parties to 24 FOURTH SUPPLEMENTAL JOINT STATUS REPORT

FOURTH SUPPLEMENTAL JOINT STATUS REPOR' 2:23-cv-00499-JLR – 1 UNITED STATES ATTORNEY 700 STEWART STREET, SUITE 5220 SEATTLE, WASHINGTON 98101 (206) 553-7970

resolve as many issues as possible, the parties propose the below deadline that will allow additional time for the parties to meet and confer. 2 3 Thus, the parties propose the following schedule: 1. The parties will continue to meet and confer, and Plaintiffs will identify any issues 4 Plaintiffs believes are in need of Court resolution by email to Defendants on or before 5 July 26, 2024. 6 2. Defendants will file their opening summary judgment brief on any identified issues 7 on or before August 16, 2024; 8 3. Plaintiffs will file their opposition and cross-motion, if any, on or before September 6, 9 2024; 10 4. Defendants will file their reply and opposition to any cross-motion, if any, on or 11 before September 27, 2024; 12 5. and Plaintiffs will file their reply in support of their cross-motion, if any, on or before 13 14 October 11, 2024. 15 16 17 18 19 20 21 22 23 24

## 

1	DATED this 13th day of June 2024.	
2		Respectfully submitted,
3		NATIONAL SECURITY COUNSELORS
4		s/ Kel McClanahan
5		KEL MCCLANAHAN, WSBA #60671 4702 Levada Terrace
6		Rockville, MD 20853 Phone: 301-728-5908
7		Fax: 240-681-2189 Email: kel@nationalsecuritylaw.org
8		Attorney for Plaintiffs
9		TESSA M. GORMAN
10		United States Attorney
11		s/ Nickolas Bohl
12		NICKOLAS BOHL, WSBA No. 48978
13		KATIE D. FAIRCHILD, WSBA No. 47712
14		Assistant United States Attorneys United States Attorney's Office
15		Western District of Washington 700 Stewart Street, Suite 5220
16		Seattle, Washington 98101-1271 Phone: 206-553-7970
17		Fax: 206-553-4073 Email: nickolas.bohl@usdoj.gov
18		Email: katie.fairchild@usdoj.gov
19		Attorneys for Defendants
20		
21		
22		
23		
24		